

1 PAUL L. REIN, Esq. (SBN 43053)
2 AARON M. CLEFTON, Esq. (SBN 318680)
3 REIN & CLEFTON, Attorneys at Law
4 200 Lakeside Drive, Suite A
5 Oakland, CA 94612
6 Telephone: (510) 832-5001
7 Facsimile: (510) 832-4787
8 info@reincleftonlaw.com

9 IRAKLI KARBELASHVILI, Esq. (SBN
10 302971)
11 ALL ACCESS LAW GROUP
12 1400 Coleman Ave Ste F28
13 Santa Clara, CA 95050
14 Telephone: (408) 295-0137
15 Fax: (408) 295-0142
16 irakli@allaccesslawgroup.com

17 CATHERINE CABALO, Esq. (SBN 248198)
18 PEIFFER WOLF CAR KANE & CONWAY LLP
19 4 Embarcadero Center, Suite 1400
20 San Francisco, CA 94111
21 Telephone: (415) 766-3592
22 Facsimile: (415) 402-0058
23 ccabalo@peifferwolf.com

24 Attorneys for Plaintiff
25 CHRISTINE DiBELLA

26 **Defense counsel listed after caption*

27 UNITED STATES DISTRICT COURT
28 NORTHERN DISTRICT OF CALIFORNIA

29 CHRISTINE DiBELLA,
30 Plaintiff,
31 v.
32 BOARD OF TRUSTEES OF THE
33 CALIFORNIA STATE UNIVERSITY;
34 COMPASS GROUP USA, INC. dba
35 CHARTWELLS HIGHER EDUCATION,
36 Defendants.

37 CASE NO. 4:21-cv-08461-HSG
38 Civil Rights

39 **STIPULATION OF SETTLEMENT AND
40 ORDER FOR DISMISSAL WITH
41 PREJUDICE OF DEFENDANT
42 COMPASS GROUP USA, INC. dba
43 CHARTWELLS HIGHER EDUCATION
44 ONLY**

45 ALISON K. BEANUM, State Bar No. 221968
46 alison.beanum@clydeco.us
47 DOUGLAS J. COLLODEL, State Bar No. 112797
48 douglas.collodel@clydeco.us
49 CLYDE & CO US LLP
50 355 South Grand Avenue, Suite 1400
51 Los Angeles, California 90071
52 Telephone: (213) 358 7600
53 Facsimile: (213) 358 7650

54 Attorneys for Defendant
55 BOARD OF TRUSTEES OF THE
56 CALIFORNIA STATE UNIVERSITY

1 Nathan V. Okelberry (SBN 266596)
2 nokelberry@fisherphillips.com
3 Justin Hall (SBN 329464)
4 jhall@fisherphillips.com
5 FISHER & PHILLIPS LLP
6 444 South Flower Street, Suite 1500
7 Los Angeles, California 90071
8 Telephone: (213) 330-4500
9 Facsimile: (213) 330-4501

10 Attorneys for Defendant
11 COMPASS GROUP USA, INC., dba
12 CHARTWELLS HIGHER EDUCATION

13 **STIPULATION**

14 Plaintiff CHRISTINE DiBELLA (“Plaintiff”) and Defendants BOARD OF TRUSTEES
15 OF THE CALIFORNIA STATE UNIVERSITY (“Government Entity Defendant”); COMPASS
16 GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION (“Chartwells”) – Plaintiff and
17 Defendants together the “Parties” – hereby stipulate and request that Defendant COMPASS
18 GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION only be dismissed from this
19 action with prejudice pursuant to FRCP 41(a). Plaintiff and Chartwells have resolved all of
20 Plaintiff’s claims against Chartwells. Accordingly, the Parties hereby stipulate and request the
21 Court to order that all of Plaintiff’s claims in this action against Defendant COMPASS GROUP
22 USA, INC. dba CHARTWELLS HIGHER EDUCATION be dismissed with prejudice, each party
23 to bear its own fees and costs. The Parties request that the Court not dismiss the claims against
24 Defendant BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY which
25 remain active, and which have not been resolved.

26 The Parties request that the Court retain jurisdiction to enforce the injunctive relief
27 measures specified in Exhibit A, attached hereto, pursuant to General Order 56

28 In the event Defendant does not complete the injunctive relief as specified in Exhibit A,
29 Defendant shall have 30 days to correct the deficiencies. After that time, Plaintiff shall be
30 entitled to make a motion to enforce the work contemplated to be done in Exhibit A and shall be
31 entitled to attorney fees and costs for any enforcement action or motion.

1 **IT IS SO STIPULATED.**

2 Date: May 13, 2022

REIN & CLEFTON

3 */s/ Aaron Clefton*
4 By AARON CLEFTON, Esq.
5 Attorneys for Plaintiff
6 CHRISTINE DiBELLA

7 Date: May 13, 2022

CLYDE & CO US LLP

8 */s/ Alison K. Beanum*
9 By ALISON K. BEANUM, Esq.
10 Attorney for Defendant
11 BOARD OF TRUSTEES OF THE
12 CALIFORNIA STATE UNIVERSITY

13 Date: May 13, 2022

14 FISHER & PHILLIPS LLP

15 */s/ Nathan V. Okelberry*
16 By NATHAN V. OKELBERRY, Esq.
17 Attorney for Defendants
18 COMPASS GROUP USA, INC, dba
19 CHARTWELLS HIGHER EDUCATION

20 **FILER'S ATTESTATION**

21 Pursuant to Local Rule 5-1, I hereby attest that I, Aaron Clefton, attorney with Rein &
22 Clefton, received the concurrence of Nathan V. Okelberry, Esq. and Alison Beanum, Esq. in the
23 filing of this document.

24 */s/ Aaron Clefton*
25 Aaron Clefton

26

27

28

ORDER

Pursuant to the stipulation of the parties and for good cause shown, IT IS SO ORDERED.

Dated: 5/13/2022

Haywood S. Gilliam, Jr.
Honorable Haywood S. Gilliam, Jr.
U.S. District Court Judge